

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Marco A. Ramos Sr., Isidra Garcia )  
Ramos, Marco Ramos Jr., Erika Ibarra )  
Ramos, Hector Ramos, Evelyn Ramos, )  
Sarai Ramos, Ramon Garcia and Rosa )  
Samaniego Garcia, Plaintiffs )  
v. )  
The Town of Cicero, a municipal )  
corporation, Cicero Police Officers )  
Ramirez # 386, Drakulich # 389, )  
Acevez # 395 and Kane # 282, )  
Defendants )

Case # 04C  
The Honorable Judge

04C 2502

JUDGE GRADY

~~RECEIVED  
APR 17 2004  
U.S. DISTRICT COURT  
CICERO, ILLINOIS~~

PLAINTIFFS' ORIGINAL COMPLAINT

A. Parties

1. Plaintiffs are Marco A. Ramos Sr., Isidra Garcia Ramos, Marco Ramos Jr., Erika Ibarra Ramos, Hector Ramos, Evelyn Ramos, Sarai Ramos, Ramon Garcia and Rosa Samaniego Garcia.
2. Defendants are the Town of Cicero, a municipal corporation and Cicero Police Officers Ramirez # 386, Drakulich # 389, Acevez # 395 and Kane # 282.

B. Jurisdiction and Venue

3. The court has jurisdiction over the lawsuit because the action arises under 42 U.S.C. § 1983. The named defendant police officers invaded the home of the plaintiffs without a warrant and beat, illegally arrested and incarcerated and maliciously prosecuted the plaintiffs. Venue is proper in that all parties at the time of the events complained of resided in the Northern District of Illinois, Eastern Division.

C. Conditions Precedent

4. All conditions precedent have been performed or occurred.

D. Facts Forming the Basis of Plaintiffs' Claims

5. On 4-17-03 at approximately 10:00 pm the plaintiffs were all in their home at 2916 S. 49<sup>th</sup> Avenue, Cicero, IL 60804 when they heard loud knocking at the rear entrance to the apartment, and persons claiming to be police. Knowing the door to be blocked by a

baby's bed and thinking the claim to be the police to be a ruse by friends, Isidra Garcia Ramos told the parties knocking to come to the front door to gain entry.

6. The police on information and belief without a valid search warrant proceeded to the stairway door in front of the location at street level and gained entry by overcoming the self locking mechanism on the door.

7. The police then proceeded up the stairs to the second floor apartment entry door, which was unlocked, opened it, and without a valid search warrant or announcing their offices or requesting permission to enter, did in fact enter the second floor apartment of the Ramos family. They encountered the family seated in their kitchen and Hector Ramos exiting the bathroom. Officer Kane # 282 rushed to Hector Ramos, reached in Hector Ramos' shirt and pulled out approximately 2 grams of marijuana and a pipe. Officer Kane then immediately handcuffed Hector Ramos while announcing that he was being arrested and escorted him out of the apartment.

8. Once outside the apartment, without provocation, Officer Kane began threatening to kill Hector Ramos if he remained in Cicero while shoving him needlessly and punching him in the head, chest and stomach.

9. Hector Ramos cried out for his mother, Isidra Garcia Ramos. Hearing his son's cries for help, Marco Ramos Sr. announces to the police words to the effect that while the police may have the right to arrest his son they don't have the right to beat him. With this officer Drakulich and officer Acevez began punching Marco Ramos Sr. in the head and chest in the presence of the entire Ramos family.

10. When Ramon Garcia protested from a seated position, officer Ramirez punched him in the head, telling him to shut up. As Isidra Garcia Ramos protested the beating of her son, husband and brother officer Acevez slammed her into the wall. Another police officer using his police baton shoved her again into the wall seconds later.

11. Simultaneously Evelyn Ramos while protesting the assault on her father, Marco Ramos Sr., her uncle, Ramon Garcia and her brother, Hector Ramos Jr. she was struck repeatedly by officer Acevez.

12. During this melee Marco Ramos Jr. and his wife Erica Ibarra Ramos, then eight months pregnant, awakened by the noise, came from the bedroom occupied by him and his wife to witness this battery on his family. After his father mother sister, brother and uncle had been handcuffed and taken out of the family's home some dozen or more officers including officer Kane tore apart the family's apparently in search of some contraband. Finding none they took Marco Ramos Jr. to the room he occupied with his wife, surrounded him and threatened him with a beating if he did not sign a document that purported to be Marco Ramos Jr.' permission to enter and search the family's home. Cicero never introduced the document at trial.

13. Sarai Ramos, the then nine year old daughter of Mr. and Mrs. Ramos Sr., witnessed the entire event.

14. The police officers involved then arrested Isidra Garcia Ramos, Marcos Ramos Sr. Evelyn Ramos and Ramon Garcia for battery on police officers, and Marco Ramos Jr. for a traffic ticket out of Oak Lawn. The police officers all signed false complaints against various members of the family, held them in custody overnight and maliciously prosecuted the case to trial.

15. On 2-23-04 a trial was held before Judge Grossi in District 4, Maybrook Courthouse. Evelyn Ramos and Ramon Garcia were found not guilty after the state rested their case in chief by directed verdict. Isidra Garcia Ramos and Marco Ramos Sr. were found not guilty after trial.

**Count 1**

**First Amendment Violation**

16. Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. incorporate paragraphs 1-15 as paragraphs 1-15 of Count 1.

17. Defendant police officers engaged in a physical battery upon the plaintiffs for merely announcing to the officers that they did not have the authority to beat and otherwise abuse the handcuffed suspect, Hector Ramos Jr. or Marco Ramos Sr., Isidra Garcia Ramos, Ramon Garcia, and Evelyn Ramos.

18. By their actions, defendant police officers punished the named plaintiffs for exercising their First Amendment Rights to engage in free speech, in an attempt to interfere with their free speech.

19. By their action defendants unlawfully injured all named plaintiffs in retaliation for their exercise of their right to free speech and in an attempt to interfere with their right to free speech under the First Amendment to The United States Constitution.

20. As a result of all defendants' deprivation of the First Amendment rights of Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr., Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. suffered physical injuries, loss of liberty, emotional injury, damage to reputation, economic loss in the form of attorneys' fees and related expenses, all compensable under 42 U.S.C § 1983.

**Count 2**

**Fourth Amendment Violation**

21. Plaintiffs Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. incorporate paragraphs 1-15 above as paragraphs 1-15 of Count 2.

22. All defendants arrested and detained Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. without probable cause to believe that they had committed an unlawful act which deprived Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. of their rights under the Fourth Amendment to the United States Constitution.

23. All defendants participated in the unreasonable seizure as set forth above and thereby caused Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. denying or interfering with the exercise of their rights under the Fourth Amendment to the United States Constitution.

24. As a result of all defendants' deprivation of the rights of Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. to be free from unreasonable searches and seizures Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. suffered physical injuries, loss of liberty, emotional injury, damage to reputation, economic loss in the form of attorneys' fees and related expenses, all compensable under 42 U.S.C § 1983.

**Count 3**

**Sixth Amendment Violation**

25. Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. incorporate paragraphs 1-15 above as paragraphs 1-15 of Count 3.

26. As part of defendants' conspiracy defendants swore out false complaints based on their own fabricated evidence of alleged attacks by Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. upon police officers in an attempt to deny plaintiff's Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. of their rights under the Sixth Amendment to the United States Constitution to a fair trial.

27. As a result of defendants' attempt to deprive Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. of their rights under the Sixth Amendment to the United States Constitution to a fair trial Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. suffered loss of liberty, damage to reputation, economic loss in the form of attorneys' fees and related expenses, all compensable under 42 U.S.C. § 1983.

**Count 4**

**Fourteenth Amendment Due Process of Law Violations**

28. Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. incorporate paragraphs 1-15 as paragraphs 1-15 of Count 4.

29. As part of defendants' conspiracy against Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. defendants, among themselves, both sought and fabricated false evidence and signed false statements and complaints against Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. in an attempt to deprive Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. of their rights under the Fourteenth Amendment to the United States Constitution to due process of law.

30. As a result of defendants' attempt to deprive Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. of their rights under the Fourteenth Amendment to the United States Constitution to due process of law, Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. suffered physical injuries, loss of liberty, damage to reputation, economic loss in the form of attorneys' fees and related expenses, all compensable under 42 U.S.C. § 1983.

**Count 5**

**Illegal Conspiracy**

31. Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. incorporate paragraphs 1-15 as paragraphs 1-15 of Count 5.

32. On the night of 4-17-04 the defendants entered the home of the plaintiffs, made an illegal search upon Hector Ramos, then assaulted and battered Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr., falsely arrested, detained and prosecuted them all. The defendants did so with illegal intent, each acting in illegal concert with the others resulting in the false arrests, filing of false police reports, unlawful restraint , wrongful incarceration and malicious prosecution of Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. These acts constitute a conspiracy to deny Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector of their rights to free speech, to be free from unreasonable searches and seizures, a fair trial, due process of law and their rights to be free from assault by officials of government.

33. The object of this conspiracy was to prevent effective criminal and administrative actions against the defendants by Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr.

34. In entering into and carrying out these conspiratorial acts defendants motivation did not intend to further any legitimate interest of the Town of Cicero or a legitimate policing authority.

35. As a result of defendants' illegal conspiracy, Isidra Garcia Ramos, Marco Ramos Sr., Evelyn Ramos, Ramon Garcia and Hector Ramos Jr. suffered physical injuries, loss of liberty, damage to reputation, economic loss in the form of attorneys' fees and related expenses, all compensable under 42 U.S.C. § 1983.

**Counts 6 through 18**

**State Tort and Common Law Claims**

36. All plaintiffs adopt paragraphs 1-15 and incorporate them as paragraphs 1-15 as to Counts 6 through 18.

37. The defendants' actions as to all plaintiffs constitute Trespass, Home Invasion, Assault, Battery, Use of Excessive Force, Unlawful Restraint, False Arrest, False Imprisonment, Filing of False Police Reports, Malicious Prosecution, Intentional Infliction of Physical Injuries, Intentional Infliction of Serious Emotional Harm.

38. The plaintiffs as a result of defendants' actions suffered loss of liberty, physical injuries, pain and suffering, loss of reputation in the community, economic damages in attorneys' fees and costs related to defending themselves against these false allegations, all damages compensable under Illinois Tort and Common Law.

**E. Attorneys Fees**

39. It was necessary for plaintiffs to hire the undersigned attorney to file this lawsuit. Upon judgment, plaintiff is entitled to an award of attorney fees and costs under 42 U.S.C. §1988(b).

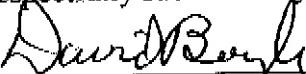
**F. Jury Demand**

40. Plaintiffs demand jury trial.

**G. Prayer for Relief**

41. WHEREFORE Plaintiffs pray for entry of judgment in their favor as against defendants for all appropriate relief available to them under 42 U.S.C. §1983 and Illinois Tort and Common Law.

Respectfully submitted by,

  
\_\_\_\_\_  
David Boyle IL # 624558  
1831 S. Lombard Ave. Cicero, IL 60804  
Tel. 708-863-7017 Fax 708-863-7018

**ATTORNEY IN CHARGE FOR**

Marco A. Ramos Sr., Isidra Garcia, Marco Ramos Jr., Erika Ibarra Ramos, Hector Ramos, Evelyn Ramos, Sarai Ramos, Ramon Garcia and Rosa, Samaniego Garcia.

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## (a) PLAINTIFFS

FILED-EP4

## DEFENDANTS

92-11147 L-Y 3470

(b) County of Residence of First Listed Plaintiff Mark A. Rambas Sr.  
(EXCEPT IN U.S. PLAINTIFF CASES)

Cook

County of Residence of First Listed

(IN U.S. PLAINTIFF CASES ONLY)

The Town of CiceroNOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.Cook

Attorneys (If Known)

MAGISTRATE JUDGE LEVINJUDGE GRADY

(c) Attorney's (Firm Name, Address, and Telephone Number)  
David Boyle, 1831 S. Lombard Ave.

Cicero IL 60804 708-863-7017

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- |  |  |
|--|--|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)   |

## III. CITIZENSHIP OF PLAINTIFF AND DEFENDANT (Place an "X" in One Box for Plaintiff and One Box for Defendant)

PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury—Med. Malpractice	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury—Product Liability	<input type="checkbox"/> PROPERTY RIGHTS	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> PERSONAL PROPERTY	<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 810 Selective Service	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 850 Securities/Commodities/Exchange	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Inj.		<input type="checkbox"/> 891 Agricultural Acts	
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 892 Economic Stabilization Act	
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	SOCIAL SECURITY	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 861 HIA (1395F)	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	Habeas Corpus:	<input type="checkbox"/> 862 Black Lung (923)	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 864 SSID Title XVI	
<input type="checkbox"/> 245 Tort Product Liability	<input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 865 RSI (405(g))	
<input type="checkbox"/> 290 All Other Real Property		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> FEDERAL TAX SUITS	
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
			<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

## V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- |   |   |  |   |  |   |  |
|---|---|--|---|--|---|--|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from another district (specify) | <input type="checkbox"/> 6 Multidistrict Litigation | <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment |
|---|---|--|---|--|---|--|

## VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

42 USC § 1983

VII. REQUESTED IN COMPLAINT:  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMANDS \$20,000,000.00 JURY DEMAND:  Yes  No

VIII. This case  is not a refiling of a previously dismissed action.

is a refiling of case previously dismissed by Judge \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

David Boyle 124-204

In the Matter of Marco Ramos Sr.  
et al

FILED-FEB 4

98-1117 L-MW-10 Case Num:

**04C 2502**

Town of Cicero, et al

U.S. DISTRICT COURT

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Marco Ramos Sr., Sidra Garcia Ramos, Marco Ramos Jr., Erika Olana Ramos,  
Heitor Ramos, Evelyn Ramos, Larci Ramos, Ramon Garcia, Rosa  
Banuego Garcia

(A)

REGISTRAR/JUDGE DEAN

SIGNATURE <u>David Boyle</u>	SIGNATURE		
NAME <u>David Boyle</u>	NAME		
FIRM	FIRM		
STREET ADDRESS <u>1831 S. Lombard Ave</u>	STREET ADDRESS		
CITY/STATE/ZIP <u>CICERO IL 60804</u>	CITY/STATE/ZIP		
TELEPHONE NUMBER <u>708 863 7017</u>	FAX NUMBER <u>708 863 7018</u>	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS <u>CRIMLAW1@COMCAST.NET</u>	E-MAIL ADDRESS		
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) <u>38076</u>	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		
DESIGNATED AS LOCAL COUNSEL?		YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE	SIGNATURE		
NAME	NAME		
FIRM	FIRM		
STREET ADDRESS	STREET ADDRESS		
CITY/STATE/ZIP	CITY/STATE/ZIP		
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		

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